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Attorneys for the Chapter 11 Debtors and
Debtors In Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re:

VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,

Debtors and Debtors In
Possession.

- ☒ Affects All Debtors
☐ Affects Verity Health System of
California, Inc.
☐ Affects O'Connor Hospital
☐ Affects Saint Louise Regional Hospital
☐ Affects St. Francis Medical Center
☐ Affects St. Vincent Medical Center
☐ Affects Seton Medical Center
☐ Affects O'Connor Hospital Foundation
☐ Affects Saint Louise Regional Hospital
Foundation
☐ Affects St. Francis Medical Center of
Lynwood Foundation
☐ Affects St. Vincent Foundation
☐ Affects St. Vincent Dialysis Center, Inc.
☐ Affects Seton Medical Center
Foundation
☐ Affects Verity Business Services
☐ Affects Verity Medical Foundation
☐ Affects Verity Holdings, LLC
☐ Affects De Paul Ventures, LLC
☐ Affects De Paul Ventures - San Jose
Dialysis, LLC

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER

Jointly Administered With:

CASE NO.: 2:18-bk-20162-ER
CASE NO.: 2:18-bk-20163-ER
CASE NO.: 2:18-bk-20164-ER
CASE NO.: 2:18-bk-20165-ER
CASE NO.: 2:18-bk-20167-ER
CASE NO.: 2:18-bk-20168-ER
CASE NO.: 2:18-bk-20169-ER
CASE NO.: 2:18-bk-20171-ER
CASE NO.: 2:18-bk-20172-ER
CASE NO.: 2:18-bk-20173-ER
CASE NO.: 2:18-bk-20175-ER
CASE NO.: 2:18-bk-20176-ER
CASE NO.: 2:18-bk-20178-ER
CASE NO.: 2:18-bk-20179-ER
CASE NO.: 2:18-bk-20180-ER
CASE NO.: 2:18-bk-20181-ER

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**STIPULATION CONTINUING HEARING RE ABBOTT
LABORATORIES INC. AND ALERE INFORMATICS,
INC.'S OBJECTION TO PROPOSED CURE AMOUNTS
AND PRELIMINARY OBJECTION TO PROPOSED
ASSUMPTION AND ASSIGNMENT OF VARIOUS
CONTRACTS [RELATED TO DKT. NOS. 1704, 1890]**

Continued Hearing:

Date: June 5, 2019

Time: 10:00 a.m.

Place: United States Bankruptcy Court
Courtroom 1568
255 East Temple Street
Los Angeles, California 90012

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300



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1 This stipulation is entered between Verity Health System of California, Inc. and the above-
2 referenced affiliated debtors, the debtors and debtors in possession in the above-captioned chapter
3 11 bankruptcy case (collectively, the “Debtors”), on the one hand, and Abbott Laboratories Inc.
4 and Alere Informatics, Inc. (collectively, “Abbott”), on the other, in the above-captioned jointly
5 administered cases with respect to the following:
6

7 1. On February 19, 2019, the Court entered its *Order (1) Approving Form Of Asset*
8 *Purchase Agreement For Stalking Horse Bidder And For Prospective Overbidders, (2) Approving*
9 *Auction Sale Format, Bidding Procedures And Stalking Horse Bid Protections, (3) Approving*
10 *Form Of Notice To Be Provided To Interested Parties, (4) Scheduling A Court Hearing To*
11 *Consider Approval Of The Sale To The Highest Bidder, And (5) Approving Procedures Related To*
12 *The Assumption Of Certain Executory Contracts And Unexpired Leases; And (II) An Order (A)*
13 *Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances*
14 [Docket No. 1572] the (“Bidding Procedures Order”).

15 2. On March 5, 2019, the Debtors filed a *Notice of Counterparties to Executory*
16 *Contracts and Unexpired Leases of the Debtors That May Be Assumed and Assigned* [Docket No.
17 1704].

18 3. On March 22, 2019, Abbott filed *Abbott Laboratories Inc. and Alere Informatics,*
19 *Inc.’s Objection to Proposed Cure Amounts and Preliminary Objection to Proposed Assumption*
20 *and Assignment of Various Contracts* [Docket No. 1890] (the “Abbott Objection”).

21 4. The Bidding Procedures Order provides that the Court will hold a hearing to
22 consider the sale on April 17, 2019, at 10:00 a.m. (Pacific Time) (the “Hearing Date”).

23 5. Abbott and the Debtors have discussed issues concerning the assumption and
24 assignment of certain Abbott agreements, and the Debtors have agreed to continue the Hearing
25 Date to allow additional time to negotiate a resolution of the Abbott Objection.

26 NOW, THEREFORE, all of the parties to this Stipulation hereby stipulate as follows:

27 A. The Hearing Date to consider the Abbott Objection shall be continued from April
28 17, 2019, at 10:00 a.m., to June 5, 2019, at 10:00 a.m. (Pacific Time). For the avoidance of doubt,

1 this Stipulation does not affect the other matters on calendar at the Sale Hearing. Any order
2 entered approving the sale will not approve the assumption and assignment of the Abbott
3 agreements. All arguments asserted in the Abbott Objection are preserved.

4 B. The deadline for the Debtors to reply to the Abbott Objection is extended to May
5 29, 2019, at 4:00 p.m. (PST).

6
7 **Verity Health System of California, Inc. et al.**

8 DATED: April 15, 2019 DENTONS US LLP

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10 By: /s/ Tania M. Moyron

11 Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

12
13 **Abbott Laboratories Inc. and Alere Informatics, Inc.**

14 DATED: April 15, 2019

KOHNER, MANN & KAILAS, S.C.

15 By: 

16 Samuel C. Wisotzkey

Counsel to Abbott Laboratories Inc. and Alere
17 Informatics, Inc.